

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: FTX TRADING LTD., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 22-11068 (KBO) (Jointly Administered) Hearing Date: TBD, If Necessary Objection Deadline: TBD, If Necessary Re: Docket Nos. 32154-32165
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**MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE RE-FILING or RE-
LOADING OF NOTICES OF
WITHDRAWALS OF TRANSFERS OF CLAIMS FOR SECURITY**

The undersigned, on behalf of Galaxy Trading Asia Limited, as Transferee (“Transferee”), hereby files this motion (the “Motion”), pursuant to Section 107 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 9018 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 9018-1 of the Local Rules for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), authorizing the re-filing or the clerk re-loading the *Notices of Withdrawals of Transfers of Claims for Security* previously filed on behalf of Transferee [Docket Nos. 32154 - 32165] (the “Withdrawals”) in identical form and content, but with revised PDF file names. In support of the Motion, it is respectfully submitted as follows:

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

JURISDICTION AND VENUE

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b) and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

2. The statutory predicates for the relief requested herein are Section 107 of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1.

3. Further, pursuant to Local Rule 9013-1(f), Transferee hereby consents to the entry of a final judgment or order in connection with the Motion if it is determined that this Court cannot, absent the consent of the parties, enter such final judgment or order consistent with Article III of the United States Constitution.

BACKGROUND AND RELIEF REQUESTED

4. On August 7, 2025 a series of Notices of Withdrawals of Transfers of Claims (the “Withdrawals”) were filed on behalf of Transferee [D.I. 32154 – 32165].

5. By agreement, the name of the transferor (the “Transferor”) that originally transferred claims for security to the Transferee was to remain confidential.

6. The Transferor is not named in the Withdrawals. However, the file names of the PDFs filed via ECF to effectuate the Withdrawals did identify the Transferor by name. That metadata was viewable when the document was opened on the CM/ECF system.

7. On August 8, 2025, upon request on behalf of Transferee, the clerk made a corrective entry to temporarily restrict access to the document images that include the name of the Transferor, advising that a motion and proposed order be filed by 5 pm on August 11, 2025, to substitute PDFs with file names that do not reveal the name of the Transferor. The Motion is filed in accordance with that advice to enable the re-filing, or having the clerk’s office re-load to the CM/ECF system, identical PDFs as those originally filed, but with different file names so the

proposed to be re-filed or re-loaded, with non-revealing file names.

8 Kroll Recovery Trust (“Kroll”) has been retained as the claims agent in these cases. The Withdrawals were loaded to Kroll's database after filing on ECF with the same metadata showing. We understand that Kroll has amended the metadata to remove the Transferor's name.

9 There will be no prejudice to any party or non-party as the re-filed or re-loaded PDFs will be identical to what is already on the Court's docket.

NO PRIOR REQUEST

10 No previous request for the relief requested herein has been made to this or any other court.

WHEREFORE, for the reasons set forth above, the undersigned on behalf of Transferee respectfully requests that the Court enter the Proposed Order granting the relief requested herein and awarding such other and further relief as is just and proper under the circumstances.

Date: August 11, 2025

Respectfully submitted,

/s/ Gregory Strong
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